

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

COSMOS GRANITE (WEST), LLC, a
Washington limited liability company,

Plaintiff,

v.

MINAGREX CORPORATION, d/b/a MGX
Stone,

Defendant.

Case No. 2:19-cv-01697-RSM

**STIPULATED MOTION AND ORDER
FOR EXTENSION OF CERTAIN
DEADLINES**

WHEREAS, on January 19, 2021, the Court signed an Order for Extension of Certain Deadlines (Dkt. No. 75);

WHEREAS, Plaintiff's Manager Hari Hara Prasad Nallapaty is currently in India, which is suffering from the world's worst COVID-19 outbreak, has several states that have implemented a lock down, and faces increasing pressure to institute a national lockdown in the face of its relentless COVID-19 crisis;

WHEREAS the United States has restricted travel from India due to the surge in COVID-10 in that country;

WHEREAS due to the unprecedented effects of the COVID-19 pandemic in India and the challenges and loss that Mr. Nallapaty has faced in light of the pandemic, the discovery that is necessary that involves Mr. Nallapaty, and the upcoming discovery completion deadline that will

be difficult to meet in light of Mr. Nallapaty's circumstances, the parties determined that there was good cause to extend the dates and schedule previously set by the Court, and agreed such an extension is necessary;

WHEREAS, the parties believe that the Court is well acquainted with the circumstances of this health emergency and the challenges it may pose; however, should the Court require a declaration explaining the impact of the COVID-19 pandemic on the parties' ability to meet the current deadlines, the parties are more than willing to articulate specific circumstances supporting good cause for this modification by submitting a declaration;

IT IS HEREBY STIPULATED AND AGREED by and through the undersigned counsel for Plaintiff and Defendant, in accordance with LCR 7(d)(1) and 10(g), subject to the approval of the Court, that trial be continued from October 12, 2021 to November 16, 2021 or as soonest thereafter as the Court permits, and the deadlines in the shall be modified as set forth below:

Event Title	Current Deadline	Proposed Amended Deadline
JURY TRIAL DATE	October 12, 2021	November 16, 2021
All Motions Related to Discovery must be filed by (<i>see</i> LCR 7(d))	May 17, 2021	June 21, 2021
Discovery Completed by	June 14, 2021	July 19, 2021
All dispositive motions must be filed by and noted on the motion calendar no later than the fourth Friday thereafter (<i>see</i> LCR 7(d))	July 14, 2021	August 18, 2021
Mediation per LCR 39.1(c)(3), if requested by the parties , held no later than	August 30, 2021	September 4, 2021
All motions in limine must be filed by and noted on the motion calendar no later than the THIRD Friday thereafter	September 14, 2021	October 19, 2021
Agreed pretrial order due	September 30, 2021	November 4, 2021
Pretrial conference to be scheduled by the Court.		

STIPULATED MOTION AND ORDER FOR EXTENSION OF
CERTAIN DEADLINES - 2
Case No. 2:19-cv-01697-RSM

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1 Trial briefs, proposed voir dire questions,
2 jury instructions, neutral statement of
the case, and trial exhibits due

October 7, 2021

November 12, 2021

3 DATED this 13th day of May, 2021.

4 SUSMAN GODFREY L.L.P.

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ORDER

Based on the foregoing, IT IS SO ORDERED.

DATED this 14th day of May, 2021.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE

Presented by:

By: /s/ Rachel S. Black

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